

Matthew Tsai, Esq.  
Nevada Bar No. 14290  
**LEWIS ROCA ROTHGERBER CHRISTIE LLP**  
3993 Howard Hughes Parkway, Suite 600  
Las Vegas, NV 89169  
Phone: 702-474-2642  
Fax: 702-949-8398  
Email: MTsai@lrrc.com

*Attorneys for Defendant Synchrony Bank*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

ADRIANA CARCELEN,

Plaintiff,

vs.

CITIBANK, N.A., a national banking  
association; SYNCHRONY BANK, a foreign  
corporation; EQUIFAX INFORMATION  
SERVICES, LLC, a foreign limited-liability  
company; EXPERIAN INFORMATION  
SOLUTIONS, INC., a foreign corporation;  
TRANS UNION LLC, a foreign limited-  
liability company;

Defendants.

Case No. 2:19-cv-01533-APG-VCF

**JOINT MOTION AND ORDER FOR  
DEFENDANT SYNCHRONY BANK TO  
RESPOND TO COMPLAINT  
(FIRST REQUEST)**

COME NOW Plaintiff Adriana Carcelen (“Plaintiff”) and Defendant Synchrony Bank (“Synchrony”), by counsel and pursuant to Local Rule IA 6-1, jointly move for an extension as follows:

**STATEMENT OF JOINT MOTION**

1. On September 3, 2019, Plaintiff filed a Complaint with this Court [ECF No. 1].
2. Synchrony was served with the Complaint on September 23, 2019.
3. Synchrony’s response to the Complaint is due by October 14, 2019.
4. The Parties have engaged in preliminary discussions in this matter. In order to adequately investigate the allegations and explore the possibility of an early resolution, Synchrony desires an extension until November 4, 2019, to file a response to the Complaint.

1           5. Counsel for Synchrony conferred with counsel for Plaintiff regarding this Joint  
2 Motion. Counsel for Plaintiff agrees to the requested extension.

3           6. This Joint Motion is filed in good faith and not for dilatory or other improper purpose.  
4 Plaintiff would not suffer any prejudice by the Court permitting Synchrony the requested extension  
5 of time and has consented to the requested extension.

6           7. This is the first request for extension of time for Synchrony to respond to the  
7 Complaint.

8 DATED: October 14, 2019.

DATED: October 14, 2019.

9  
10 /s/ Matthew Tsai  
11 Matthew Tsai  
12 Nevada Bar No. 14290  
13 LEWIS ROCA ROTHGERBER CHRISTIE LLP  
14 3993 Howard Hughes Parkway, Suite 600  
15 Las Vegas, NV 89169

16 *Counsel for Defendant Synchrony Bank*

/s/ Kevin L. Hernandez  
Kevin L. Hernandez  
Nevada Bar No. 12594  
LAW OFFICE OF KEVIN L. HERNANDEZ  
8872 S. Eastern Avenue, Suite 270  
Las Vegas, NV 89123

*Counsel for Plaintiff Adriana Carcelen*

17 **ORDER**

18 **IT IS SO ORDERED.**

19   
20 UNITED STATES MAGISTRATE JUDGE

21 DATED: 10-15-2019  
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